

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**MATTHEW WILLIAMS, Individually and on
Behalf of All Others Similarly Situated**

PLAINTIFF

vs.

No. 1:22-cv-3544-EEC

**TEAM NOMAD, LLC,
and AKRAM ATALLAH**

DEFENDANTS

JOINT NOTICE OF SETTLEMENT

Plaintiffs and Defendants submit this Joint Notice of Settlement to apprise the Court that Plaintiffs and Defendants have reached a settlement in principle that will resolve all claims asserted by Plaintiffs. The parties are in the process of finalizing settlement terms and expect to file a Joint Motion for Approval of Settlement and Dismissal of Lawsuit with Prejudice with the Court within thirty (30) days from the filing of this Joint Notice of Settlement. Should the parties be unable to file their dismissal papers by this date, they will make an appropriate request for extension to the Court, if required, or provide a status update. In light of their progress, the parties request that all deadlines be stayed pending finalization of their settlement.

Respectfully submitted,

**MATTHEW WILLIAMS, Individually
and on Behalf of All Others
Similarly Situated, PLAINTIFF**

SANFORD LAW FIRM
Kirkpatrick Plaza
10800 Financial Centre Pkwy, Suite 510
Little Rock, Arkansas 72211
Telephone: (800) 615-4946
Facsimile: (888) 787-2040

/s/ Josh Sanford

Josh Sanford
Ark. Bar No. 2001037
josh@sanfordlawfirm.com

**and TEAM NOMAD, LLC, and
AKRAM ATALLAH, DEFENDANTS**

DOWNEY & LENKOV, LLC
30 N. LaSalle Street, Suite 3600
Chicago, IL 60602
Telephone: (312) 377-1501
Facsimile: (312) 377-1502

/s/ Storrs Downey

Storrs Downey
ARDC No. 6183060
sdowney@dl-firm.com

/s/Jessica Jackler

Jessica Jackler
ARDC No. 6305472
jjackler@dl-firm.com